

DIRECT TESTIMONY OF
MICHAEL L. SEAMAN-HUYNH
ON BEHALF OF
THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF
DOCKET NOS. 2022-93-E & 2022-97-E

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.**

2 A. My name is Michael Seaman-Huynh. My business address is 1401 Main Street,
3 Suite 900, Columbia, South Carolina 29201. I am employed by the State of South Carolina
4 as Deputy Director of Energy Operations at the Office of Regulatory Staff (“ORS”).

5 **Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

6 A. I received my Bachelor of Arts from the University of South Carolina in 1997. Prior
7 to my employment with ORS, I was employed as an energy analyst with a private
8 consulting firm. I joined ORS in 2006 as an Electric Utilities Specialist and was promoted
9 to Senior Electric Utilities Specialist in 2010. When the Energy Regulation Department
10 was formed in August 2015, I assumed the position of Senior Regulatory Analyst. In May
11 2016, the Utility Rates and Services Division was formed, and I was promoted to the
12 position of Senior Regulatory Manager. I assumed my current position in August of 2019.

13 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC SERVICE**
14 **COMMISSION OF SOUTH CAROLINA (“COMMISSION”)?**

15 A. Yes. I have previously testified before the Commission on numerous occasions in
16 connection with hearings concerning annual fuel clause proceedings, annual purchased gas

adjustment proceedings, general rate cases, Utility Facility Siting and Environmental Protection Act proceedings, and various other regulatory proceedings.

Q. WHAT IS THE MISSION OF THE OFFICE OF REGULATORY STAFF?

A. ORS represents the public interest as defined by the South Carolina General Assembly in S. C. Code Ann. § 58-4-10 as:

[T]he concerns of the using and consuming public with respect to public utility services, regardless of the class of customer, and preservation of continued investment in and maintenance of utility facilities so as to provide reliable and high-quality utility services.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS PROCEEDING?

A. The purpose of my direct testimony is to provide the results of ORS's review of the Applications ("Applications") of SR Lambert I, LLC ("SR Lambert I") and SR Lambert II, LLC ("SR Lambert II") (collectively "SR Lambert") for Certificates of Environmental Compatibility and Public Convenience and Necessity ("Certificates") filed on March 4, 2022, to construct and operate two ac solar photovoltaic ("PV") projects to be located in Georgetown County, South Carolina ("Solar Facilities"). I also address the proposed transmission substation and tie line necessary to interconnect the Solar Facilities to the transmission grid. My review focused specifically on the impact of the Solar Facilities,¹ whether the environmental impact of the Solar Facilities is justified,² the reasonable assurances that the Solar Facilities will conform to applicable State and local laws and regulations issued thereunder,³ and whether the public convenience and necessity requires

¹ S.C. Code Ann. § 58-33-160(1)(b)

² S.C. Code Ann. § 58-33-160(1)(c)

³ S.C. Code Ann. § 58-33-160(1)(e)

the construction of the Solar Facilities⁴. The Applications were filed pursuant to S.C. Code Ann. §§ 58-33-10 *et seq.* (“Siting Act”) and S.C. Code Ann. Regs. 103-304.

Q. WAS THE REVIEW PERFORMED BY YOU OR UNDER YOUR SUPERVISION?

A. Yes, the review to which I testify was performed by me or under my supervision.

Q. PLEASE DISCUSS ORS’S REVIEW OF THE APPLICATIONS.

A. ORS reviewed the Applications, which included copies of the required notifications; direct testimonies of SR Lambert witnesses Matthew Kisber, Conner Echols, Blair Wade, and Kenneth Sercy; and the supplemental direct testimonies of witnesses Echols and Wade. ORS also reviewed the numerous studies included in the Applications and witness exhibits to ensure compliance with the requirements of the Siting Act. Finally, ORS reviewed additional materials provided by SR Lambert through discovery and conducted discussions with the Companies’ representatives.

Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PROPOSED FACILITIES.

A. SR Lambert I is a 100 megawatt (“MW”) ac PV facility with single-axis tracking capability to be located in Georgetown County, South Carolina. SR Lambert II is a companion facility of the same capacity size and technology, located adjacent to SR Lambert I in Georgetown County, South Carolina.

To interconnect the Solar Facilities to the transmission grid, SR Lambert will construct a series of transmission related facilities. These will include a 230-34.5 kilovolt (“kV”) substation and 230 kV transmission tie line (“Transmission Facilities”) that will connect to a South Carolina Public Service Authority (“Santee Cooper”) 230 kV switching station located adjacent to the Solar Facilities. While SR Lambert’s initial Applications do

⁴ S.C. Code Ann. § 58-33-160(1)(f)

not specifically address the Transmission Facilities, SR Lambert provided additional information regarding the Transmission Facilities in the Supplemental direct testimony of witness Echols. I will refer to the Solar Facilities and Transmission Facilities collectively as the “Projects” going forward.

Q. PLEASE DESCRIBE THE INFORMATION THE SITING ACT REQUIRES IN AN APPLICATION FOR A CERTIFICATE.

A. The Siting Act directs that an Application contain a description of the location and the major utility facility(ies) to be built; a summary of any studies that have been made of the environmental impact of the facility(ies); a statement explaining the need for the facility(ies); and such other information as the applicant may consider relevant or as the Commission may require.

Q. DO THE APPLICATIONS CONTAIN THIS REQUIRED INFORMATION?

A. Yes. A description of the Projects and their locations is presented, as well as siting and environmental reports including a description of the intended use and need for the facilities in the Application and supplemental filings.

Q. WHAT IS THE PROBABLE ENVIRONMENTAL IMPACT OF THE SOLAR FACILITIES?

A. SR Lambert conducted a Critical Issues Analysis (“Exhibit 3”), a Phase I Environmental Site Assessment (“Exhibit 4”), and a Cultural Resources Assessment (“Exhibit 5”) (collectively the “Studies”) to determine the environmental and cultural impacts of the Projects. The Studies take into consideration the effect of the Projects on the environment as well as cultural and land use resources. The Studies indicate the Projects will not have a significant impact on the environment and the impact on cultural and land

1 use resources will be minimized by the Projects. ORS believes the impact of the Projects
2 upon the environment is justified.

3 **Q. DOES THE COMPANY PROVIDE REASONABLE ASSURANCE THAT THE**
4 **PROJECTS WILL CONFORM TO APPLICABLE STATE AND LOCAL LAWS**
5 **AND REGULATIONS?**

6 A. Yes. In the Application and prefiled testimony, SR Lambert affirms the Projects
7 will conform to all applicable state and local laws and regulations as they pertain to the
8 Projects and associated facilities.

9 **Q. WERE ANY COMMENTS FILED IN THIS DOCKET PERTAINING TO THE**
10 **COMPANIES' APPLICATIONS?**

11 A. No.

12 **Q. HAS THE COMPANY SECURED THE LAND THAT THE PROJECTS WILL**
13 **OCCUPY?**

14 A. Yes. SR Lambert is the sole owner of the property that the Projects will occupy.

15 **Q. WILL THE PUBLIC CONVENIENCE AND NECESSITY BE SERVED BY THE**
16 **PROJECTS PROPOSED IN THE APPLICATIONS?**

17 A. Yes. ORS's review concluded that the Projects will result in minimal impact to the
18 environment and, as addressed by ORS witness Anthony Sandonato, will serve the interests
19 of system economy and reliability.

20 **Q. WILL YOU UPDATE YOUR TESTIMONY BASED ON INFORMATION THAT**
21 **BECOMES AVAILABLE?**

1 A. Yes. ORS reserves the right to revise its recommendations via supplemental
2 testimony should new information not previously provided by the Company, or other
3 sources become available.

4 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

5 A. Yes, it does.